

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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*Southern District of New York*  
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August 30, 2021

**BY ECF**

The Honorable Judge Denise L. Cote  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

**RE: United States v. David Uro  
20 Cr. 179 (DLC)**

Honorable Judge Cote:

I write on behalf of my client, David Uro, to respectfully request that the Court modify Mr. Uro's bail conditions to allow him to (1) travel beyond the District of New Jersey and the Southern and Eastern Districts of New York for work, and (2) permit Pretrial Services to return to Mr. Uro his travel documents for renewal and order Mr. Uro to return the documents to Pretrial Services upon receipt of the newly issued documents. The Government and Pretrial Services do not object to these requests.

On February 27, 2020, Magistrate Judge Sarah L. Cave released Mr. Uro on his own signature and imposed the following bail conditions: a \$50,000 personal recognizance bond, cosigned by two financially responsible persons; travel restricted to SDNY/EDNY and the District of New Jersey for employment; surrender of all travel documents and no new applications; pretrial supervision as directed by Pretrial Services; maintain current residence (cannot relocate without permission of Pretrial Services); maintain employment; no new bank accounts or lines of credit without prior approval from Pretrial Services; and no contact with co-defendants unless in the presence of counsel. Mr. Uro's bail conditions were timely satisfied.

In September 2020, the Court granted Mr. Uro's bail modification request to allow him to travel more extensively in service of his car/freight shipping business. Specifically, the Court granted permission for Mr. Uro to travel throughout New York and the following nearby states for work purposes only: New Jersey, Delaware, Pennsylvania, Massachusetts, and Connecticut.

On June 30, 2021, the Court approved Mr. Uro's deferred prosecution, which is set to expire on December 30, 2021. As a result, the conditions of Mr. Uro's original bond were replaced by the deferred prosecution conditions, which did not include the extended travel conditions previously approved by the Court. Mr. Uro now requests that the Court once again allow Mr. Uro to travel throughout New York and the following nearby states for work purposes only: New Jersey, Delaware, Pennsylvania, Massachusetts, and Connecticut, consistent with the conditions of release that the Court approved 11 months ago.

In addition, Mr. Uro's travel documents have expired since the start of the case. He would like to renew the documents in anticipation of travel to Africa to visit family following the expiration of his deferred prosecution period. Accordingly, Mr. Uro respectfully requests that the Court permit Pretrial Services to return the travel documents to Mr. Uro for renewal and order Mr. Uro return the documents to Pretrial Services upon receipt of the newly issued documents.

Throughout the pendency of his case, Mr. Uro has been fully compliant with his bail conditions and has reported to Pretrial Services as directed. The Government and Pretrial Services do not object to these requests.

Thank you for your consideration of these requests.


Respectfully submitted,

/s/

Marne L. Lenox  
Assistant Federal Defender  
(212) 417-8721

**SO ORDERED:**

Dated: August 31, 2021

  
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DENISE COTE  
United States District Judge

cc: Assistant United States Attorney Jun Xiang  
Assistant United States Attorney Kevin Mead  
Courtney Defeo, United States Pretrial Services Officer Assistant (by e-mail)